

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EMMANUEL A. ADIGUN,

Plaintiff,

-against-

ECMC, INTERNAL REVENUE SERVICE, SOCIAL
SECURITY ADMINISTRATION, PREMIER CREDIT
OF N. AMERICA, NYS HIGHER EDUCATION
SERVICES, AND WACHOVIA EDUCATIONAL
SERVICES,

Defendants.

Docket No. 20-CV-3676 (AT) (SN)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated October 30, 2020, and all prior proceedings had herein, Defendant Premiere Credit of North America, LLC (“Premiere Credit”), by its attorneys, Hinshaw & Culbertson LLP, will move this Court at the United States Courthouse located at 500 Pearl Street, New York, New York 10007, before the Honorable Analisa Torres, at a date and time to be determined by the Court, for an Order pursuant to Rules 12(b)(5) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff Emmanuel A. Adigun’s Complaint in its entirety as against Premiere Credit, with prejudice, and granting Defendant Premiere Credit such other and further relief as the Court deems just and proper.

Dated: New York, New York
October 30, 2020

HINSHAW & CULBERTSON LLP
Attorneys for Defendant
Premiere Credit of North America, LLC

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TO: VIA ECF

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Southern District of New York
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Social Security Administration

VIA FIRST-CLASS MAIL

NYS Higher Education Services
P.O. Box 3077
Winston-Salem, NC 27102
Forsyth County
Defendant

Wachovia Educational Services
99 Washington Avenue, Room 1430
Albany, NY 12255
Albany County
Defendant